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                                                     DRAFT—NOT TO BE ENTERED

REMARKS

In the Office action mailed on February 10, 2004, the specification and drawings are objected to, and claims 1–12 are rejected. In particular, claims 1 and 7–9 are rejected under 35 U.S.C. § 112, claims 1, 6, 9–10, and 12 are rejected under 35 U.S.C. 102(e) over U.S. Patent No. 6,366,124 to Alam et al. ("*Alam*"), claims 2 and 7 are rejected under 35 U.S.C. § 103(a) over *Alam*, claims 3–5 are rejected under 35 U.S.C. § 103(a) over *Alam* and U.S. Patent No. 6,125,391 to Meltzer et al. ("*Meltzer*"), claim 8 is rejected under 35 U.S.C. § 103(a) over *Alam* and U.S. Patent No. 6,034,700 to Rumph et al. ("*Rumph*"), and claim 11 is rejected under 35 U.S.C. § 103(a) over *Alam* and U.S. Patent No. 5,278,678 to Harrington et al. ("*Harrington*"). Applicant traverses the rejections and objections. Applicant further cancels claims 3 and 12, adds claims 13–33, and amends the drawings, specification, and claims 1, 4, 5, 7–9, and 11. Applicant submits that no new matter is added in these amendments. Applicant respectfully requests reconsideration of the claims based upon the foregoing amendments and the following remarks.

Drawings

Specification

Amended Claims 1 and 7 and Original Claims 8 and 9 Satisfy 35 U.S.C. § 112

Claim 1 is amended to replace the term "said visual display" with the term "said visual image" for which the preceding paragraph of the claim provides antecedent basis. As suggested by the Examiner, claims 7–9 are amended to depend upon claim 6 instead of claim 5. Therefore, applicant submits that amended claims 1 and 7–9 are in condition for allowance.

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<u>Amended Independent Claim 1 Is Patentable Over the Cited References</u>

Amended independent claim 1 relates to a digital document processing system.

Amended independent claim 1 recites:

> A digital document processing system, comprising an adaptable front end for receiving an input stream representing source data in one of a plurality of predetermined data formats and containing information representative of a visual image, wherein the source data defines a content and a structure of a digital document,
>
> an interpreting module for interpreting said input stream to generate an internal representation of said visual image, wherein said internal representation describes said structure separately from said content, and said internal representation further describes said structure in terms of generic objects defining a plurality of data types and parameters defining properties of specific instances of generic objects, and
>
> a rendering engine for processing said internal representation and for generating an output data stream suitable for driving an output device to present the visual image.

Independent claim 1 is amended to include the limitations of now cancelled claim 3. As indicated in the Office action, *Alam* does not describe all the limitations of cancelled claim 3. In particular, *Alam* does not describe an internal representation of a data source that "describes said structure separately from said content". Therefore, applicant submits that amended independent claim 1 is patentable over *Alam* under 35 U.S.C. § 102(e).

Cancelled claim 3, having similar limitations as amended independent claim 1, is rejected over *Alam* and *Meltzer* under 35 U.S.C. 103(a). However, neither *Alam* nor *Meltzer*, individually or in combination, teach or suggest all elements of cancelled claim 3 or amended independent claim 1, as required by MPEP § 2143 to demonstrate a prima facie case of obviousness.

As indicated in the Office action, *Alam* fails to describe an internal representation of a data source that separates structure from content.

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Meltzer describes the processing of an incoming document by parsing the document,

translating the document into the format of the host, and then creating an output document. Col

26, lns. 19–39. The translation of the document into the host format is described as follows:

> In this example, the XML logic structures are translated into JAVA objects which
>
> carry the data of the XML element as well as methods associated with the data
>
> such as get or fetch.

Col. 26, lns. 26–30. *Meltzer* maintains the structure of the incoming document, i.e., the XML

logic structures, and the content, i.e., the data of the XML element, in unitary Java objects.

Therefore, *Meltzer* fails to describe an internal representation of a data source that separates

structure from content.

As neither *Meltzer* nor *Alam* describe an internal representation "describes said structure

separately from said content", no combination of the references could possibly teach or suggest

all elements of amended independent claim 1. Neither *Rumph* nor *Harrington* cures this

deficiency in *Meltzer* and *Alam*.

In addition, *Meltzer* and *Alam* cannot properly be combined to create a prima facie

obviousness rejection. References cannot be combined if the combination would change the

principle of operation of either of the references. MPEP § 2143. *Meltzer* provides for business

communications and transactions using "predefined, machine readable business documents".

Col. 2, lns. 51–54. Meltzer provides for "storing a machine readable specification of an interface

for a transaction, the specification includes a definition of an input document and a definition of

an output document." Col. 3, lns. 22–25. In contrast, *Alam* determines the structure of a

document based on the document itself, without being constrained by predefined structures. In

particular, *Alam* describes:

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locating and storing tags in the input format document at a step 700, locating words from the digital data at step 702, joining the located words into lines at step 704, joining the lines into paragraphs at a step 706, locating tables from the joined paragraphs at a step 708, and outputting the intermediate format data generated from steps 702, 704, 706, and 708 at step 710.

Col. 7, lns 15–21. Since a combination of the references would require *Meltzer* to abandon its use of predefined documents, or require *Alam* to become constrained to predefined document specifications, either of which change would alter the principle of operation of the given reference, it would be improper to combine the references to create a prima facie case of obviousness.

No cited reference or combination of cited references teach or describe all elements of amended independent claim 1. Even if the combination of references suggested in the Office action did result in the claimed invention, it would be improper to combine those references. Therefore, applicant submits that amended independent claim 1 is patentable over *Alam*, *Meltzer*, *Rumph*, *Harrington*, and any combination thereof. As claims 2 and 4–33 depend from amended independent claim 1, applicant submits that claims 2 and 4–33 are patentable as well.

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CONCLUSION

In view of the above, each of the presently pending claims in this application is believed

to be in immediate condition for allowance. Accordingly, the Examiner is respectfully requested

to pass this application to issue.

Applicant believes no fee is due with this response. However, if a fee is due, please

charge our Deposit Account No. 18-1945, under Order No. PGLD-P01-001 from which the

undersigned is authorized to draw.

Dated: April 19, 2004   Respectfully submitted,

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Attachments

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